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27 June 2025

BY ECF

The Honorable Victoria Reznik
United States District Judge
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York, 10601-4150

Re: The Wave Studio, LLC: Consolidated New York Cases, No. 13-9239 (S.D.N.Y.)
June 20, 2025 Order ECF No. 529

Dear Judge Reznik:

Defendant Citibank N.A. (“Citi”), in compliance with the Court’s June 20, 2025 Order (ECF No. 529), respectfully submits this letter in response to Plaintiff The Wave Studios LLC’s (“Wave”) June 18, 2025 letter (ECF No. 528).

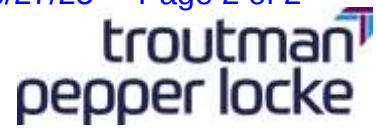
Defendant Citi confirms its current docket No. 13-9239 record of counsel as Daniel E. Gorman, James Schutz, and Puja Patel Lea of the law firm Troutman Pepper Locke LLP (formerly Troutman Pepper Hamilton Sanders LLP), as well as co-counsel Kimberly Dodd and Roma Lopes of the law firm of Foley & Lardner LLP.¹

To the extent that the second appearance of Citibank N.A. on the docket as a “Consolidated Defendant” requires a response, Citi confirms that Daniel E. Gorman, James Schutz, and Puja Patel Lea of the law firm Troutman Pepper Locke LLP and Kimberly Dodd and Roma Lopes of the law firm of Foley & Lardner LLP also act as co-counsel of record for the duplicative Consolidated Defendant Citibank N.A. appearance.

Additionally, Citi will update its counsel of record in the single related case in which it is named, *The Wave Studio, LLC v. Citibank N.A. et al.*, 22-5141, to similarly reflect that the current counsel of record aligns with *The Wave Studio, LLC: Consolidated New York Cases*, No. 13-9239 (S.D.N.Y.).

Citi responds to the remaining issues set forth in Wave’s June 18, 2025 letter as follows:
(i) Citi takes no position on the role of the operative complaint vis-a-vis the complaints in the

¹ Kimberly Dodd and Roma Lopes of the law firm of Foley & Lardner LLP have made appearances and respective pro-hac vice admissions into the related and consolidated *The Wave Studio, LLC v. Citibank N.A. et al.*, 22-5141.



individual actions; (ii) Citi takes no position on whether certain Defendants "leverage procedural ambiguity to evade participation," as this section does not appear to pertain to Citi; (iii) Citi has informed Wave and remains open to discussing settlement; and (iv) Citi submits that any status conference is premature, given the pending motions to dismiss by other Defendants.

Sincerely,

By: 
Puja Patel Lea

cc: Counsel of Record